

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

THE UNITED STATES OF AMERICA

v.

No. 1:21-cr-41-JL-1

IAN FREEMAN

**ASSENTED-TO MOTION TO FILE UNDER SEAL: DEFENSE MEMORANDUM
IN RESPONSE TO GOVERNMENT RESTITUTION REQUESTS**

The defense, with the assent of the Government, moves to file its “Defense Memorandum in Response to Government Restitution Requests” under seal at Level 1 because the memorandum states the full names and personal information regarding alleged victims in this case. The Court has already ordered that related filings by the Government be sealed. Assistant United States Attorney Georgianna MacDonald assents to this request.

WHEREFORE the defense requests that the Court order that the Defense Memorandum in Response to Government Restitution Requests may be filed under seal at Level 1.

Date: December 13, 2023.

Respectfully submitted by counsel for Ian Freeman

/s/ Richard Guerriero

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to registered participants identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the nonregistered participants on the date the document was signed by me.

/s/ Richard Guerriero

Richard Guerriero, Esq.